

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

TAEYAN RAYMOND WILLIAMS,

Defendant

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Case No. PX-18-631

**DEFENDANT TAEYAN WILLIAMS' RESPONSE TO GOVERNMENT'S
MOTION *IN LIMINE* TO PROHIBIT ALTERNATIVE SUSPECT
EVIDENCE**

COMES NOW Defendant, Taeyan Williams ("Mr. Williams"), by and through his counsel, Michael E. Lawlor, Adam C. Demetriou, and Brennan, McKenna & Lawlor, Chtd., and Alfred Guillaume, III, Law Offices of Alfred Guillaume III, LLC and respectfully responds to the Government's Motion *in Limine* to Prohibit Alternative Suspect Evidence (the "Motion") (ECF No. 140.) In support of this response, counsel state as follows:

1. The Government asks this Court to preclude Mr. Williams from introducing evidence about or questioning witnesses about an individual identified as N.J. The Government proffers that N.J. was ordered to rent a storage unit at the same Jessup storage facility used by Noah Smothers, the alleged victim in this case. The Government states that on April 5, 2018, the date of Mr. Smothers' disappearance, N.J. also received marijuana from the same shipping company employed by Mr.

Smothers. The Government further notes that N.J. and his older brother were later charged in connection with a double murder that occurred in Towson on April 8, 2018.

2. The Government represents that counsel for Mr. Williams are aware of N.J.'s true identity. (ECF No. 140 at 1 n.1.)

3. Undersigned counsel have conferred and are not aware of the identity of N.J.

4. The information proffered in the Motion appears to be exculpatory as to Mr. Williams and implicates *Brady v. Maryland*, 373 U.S. 83 (1963). *See also Juniper v. Zook*, 876 F.3d 551, 565 (4th Cir. 2017) (holding that information pertaining to an alternate suspect may implicate the *Brady* rule).

5. Mr. Williams requests disclosure of the information underlying the Government's proffer. Mr. Williams reserves his right to argue for any applicable sanctions should it become apparent that there has been a *Brady* violation. Mr. Williams also reserves his Sixth Amendment right to mount a fulsome defense to the charges the Government has brought.

Wherefore, Mr. Williams respectfully submits this response to the Government's Motion *in Limine* to Prohibit Alternative Suspect Evidence.

Respectfully submitted,

s/_____

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_____/s/_____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 10, 2022, a copy of the foregoing was sent to the United States Attorney's Office for the District of Maryland, via ECF.

s/_____

Michael E. Lawlor